

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
MONIQUE KIRTLEY
3 411 E. Bonneville Avenue, Ste. 250
Las Vegas, Nevada 89101
4 Tel: (702) 388-6577
Fax: (702)388-6261

5 Attorney for:
6 JORGE FRANCO-IBARRA

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 * * *

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 vs.
15 JORGE FRANCO-IBARRA
16 Defendant.

2:14-cr-173-JCM-PAL

STIPULATION TO CONTINUE
SENTENCING HEARING
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
18 States Attorney, and Robert A. Bork, Assistant United States Attorney, counsel for the United States
19 of America, and Rene L. Valladares, Federal Public Defender, and MONIQUE KIRTLEY, Assistant
20 Federal Public Defender, counsel for JORGE FRANCO-IBARRA that the sentencing hearing
21 scheduled on Thursday, March 5, 2015 at 10:00 a.m., be vacated and be continued to a date and
22 time convenient to the Court, but no earlier than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. The defendant is in custody but does not oppose a continuance.
25 2. Client's family members will be traveling to the area from Mexico during the month
26 of May and wish to be present in support of the defendant during the sentencing hearing.

27 ///
28

1 3. Undersigned counsel needs additional time to receive, translate and present letters of
2 support for the defendant from his family in Mexico.

3 4. This is the first request for a continuance of the sentencing hearing.
4

5 DATED: February 26, 2015
6

7
8 RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN,
United States Attorney

9
10 By: /s/ Monique Kirtley
11 MONIQUE KIRTLEY
Assistant Federal Public Defender

By: /s/ Robert A. Bork
ROBERT A. BORK
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:14-cr-173-JCM-PAL

Plaintiff,

ORDER

vs.

JORGE FRANCO-IBARRA

Defendant.

ORDER

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, title 18, United States Code, § 3161 (h)(7)(A), when the considering the facts under Title 18, United States Code, §§ 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

IT IS THEREFORE ORDERED that the Sentencing currently scheduled for Thursday, March 5, 2015 at 10:00 a.m., be vacated and continued to May 14, 2015 at the hour of 10:00 a.m..

DATED February 26, 2015.


UNITED STATES DISTRICT JUDGE